

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 3:20-cr-06
	)	
AMANDA NICHELLE DOWNS	)	

POSITION OF THE GOVERNMENT  
WITH RESPECT TO SENTENCING FACTORS

AND NOW comes the United States of America by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Maureen Sheehan-Balchon, Assistant United States Attorney for said District, and pursuant to Local Criminal Rule 32.1(D) of the Local Rules of this Court, respectfully represents as follows:

1. The Government received the Presentence Report for Amanda Nichelle Downs, and subsequently conferred with United States Probation Officer Specialist, Michael Howard, and Defense Counsel, Arthur T. McQuillan, Esquire, regarding the contents of the Presentence Report.

2. Pursuant to the Sentencing Guidelines, the Government hereby gives notice it has adopted the findings of the Presentence Report.

Respectfully submitted,

CINDY K. CHUNG  
United States Attorney  
PA ID No. 317227

/s/ Maureen Sheehan-Balchon  
MAUREEN SHEEHAN-BALCHON  
Assistant U.S. Attorney  
PA ID No. 78059

CERTIFICATION

I hereby certify that I have previously discussed the above matters with the probation officer and counsel for Defendant. The government has no objections and has adopted the findings of the Presentence Report.

Dated May 20, 2022

/s/ Maureen Sheehan-Balchon  
MAUREEN SHEEHAN-BALCHON  
Assistant U.S. Attorney  
PA ID No. 78059